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9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13
14 UNITED STATES OF AMERICA,) No. CR 05-00395 CRB

15 Plaintiff,)

16 v.)

17 YOUNG JOON YANG, et al.,)

18 Defendants)

19 UNITED STATES OF AMERICA,)

20 Plaintiff,)

21 v.)

22 YON SUK PANG,)

23 a/k/a Yon S. Pang,)

a/k/a Nana, and)

24 HYON CHU YIM,)

a/k/a Hyon C. Yim,)

a/k/a Tina,)

26 Defendants.)

27) No. CR 06-0101 VRW CRB

28 STIPULATION AND [PROPOSED]
SUPPLEMENTAL PROTECTIVE ORDER
REGARDING DISCOVERY AS TO
DEFENDANT HYON CHU YIM

The United States, through its counsel of record, and defendant Hyon Chu Yim, through her

1 counsel of record, hereby agree and stipulate that the government will provide discovery on the
2 following conditions:

3 1. Protected Material

4 The discovery produced in this matter is deemed Protected Material. Possession of
5 copies of the Protected Material is limited to the defendants, their attorneys of record, and
6 investigators, paralegals, law clerks, translators, interpreters, experts and assistants for the
7 attorneys of record (hereinafter collectively referred to as "members of the defense team").

8 The defendants, their attorneys of record, and members of the defense team acknowledge
9 that providing copies of the Protected Material to other persons is prohibited, and agree not to
10 duplicate or provide copies of the Protected Material to other persons. The defendants, their
11 attorneys of record, and members of the defense team may show Protected Material to witnesses
12 or prospective witnesses in conjunction with their defense of the defendants in this case. The
13 defendants, their attorneys of record, and members of the defense team further acknowledge that
14 they are prohibited from using the Protected Material for any purpose other than defending the
15 defendant in the above-captioned matter. Any violation of these prohibitions constitutes a
16 violation of the Protective Order. Further, the attorneys of record agree that prior to
17 disseminating any copies of the Protected Material to members of the defense team, they will
18 provide a copy of this Protective Order to members of the defense team.

19 Notwithstanding efforts taken by the government to redact personal information of
20 witnesses from the discovery provided to the defense (such as date of birth, social security
21 numbers, addresses, phone numbers, etc.), defense counsel, the defendants and members of the
22 defense team agree that, should any such information be found during their review of this
23 material, they will not provide that personal information in any form – whether in verbal, written
24 or electronic format – to any third party, for any reason whatsoever.

25 2. Nontermination

26 The provisions of this Order shall not terminate at the conclusion of this prosecution but
27 only upon further order of this Court. Within 30 days of a verdict or guilty plea, the defendants'
28 attorneys of record shall return all copies of any Protected Material (including all copies provided

1 to the defendants, their attorneys of record, and members of the defense team) to the United
2 States Attorney's Office for the Northern District of California.

3 SO STIPULATED.

4 DATED: 3/10/06

/S/ PETER B. AXELROD _____
5 PETER B. AXELROD
6 LAUREL BEELER
Assistant United States Attorneys

7 DATED: 3/8/06

/S/ JOSEPH SULLIVAN _____
8 JOSEPH O'SULLIVAN
9 Counsel for Defendant HYON CHU YIM

10 DATED: March 16, 2006

